## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NATHAN CALDWELL, SR., (01), a/k/a "PRINCE BOSSALINIE," [DOB: 11/07/1971]

NATHAN CALDWELL, JR., (02),

[DOB: 08/17/1991]

Defendants.

Case No. 4:24-CR-00103-01/02-W-BCW

### **COUNT ONE: BOTH DEFENDANTS**

(Engaging in the Business of Dealing in Firearms Without a License)

 $18\;U.S.C.\;\S\S\;922(a)(1)(A),\,923(a),\,and$ 

924(a)(1)(D)

NMT: 5 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class D Felony

# COUNTS TWO, THREE, FOUR, SEVEN, TEN, THIRTEEN, FIFTEEN, EIGHTEEN, TWENTY-ONE, and TWENTY-SIX: DEFENDANT NATHAN CALDWELL, SR.

## COUNTS TWELVE, TWENTY-FIVE, and TWENTY-EIGHT: DEFENDANT NATHAN CALDWELL, JR.

(Felon in Possession of a Firearm)

18 U.S.C. §§ 922(g)(1) and 924(a)(8)

NMT: 15 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class C Felony

# COUNTS FIVE, FOURTEEN, NINETEEN, TWENTY-TWO, and TWENTY-SEVEN: DEFENDANT NATHAN CALDWELL, SR. ONLY

#### (Distribution of Methamphetamine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT: 5 Years' Imprisonment

NMT: 40 Years' Imprisonment

NMT: \$5,000,000 Fine

NLT: 4 Years' Supervised Release

Class B Felony

### <u>COUNTS SIX and SEVENTEEN</u>: DEFENDANT NATHAN CALDWELL, SR. ONLY

### (Possession of Firearms in Furtherance of a Drug Trafficking Crime)

18 U.S.C. § 924(c)(1)(A)(i)

NLT: 5 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$250,000 Fine

NMT: 5 Years' Supervised Release

Sentence Consecutive to Any Other Sentence

Class A Felony

## COUNTS EIGHT and ELEVEN: DEFENDANT NATHAN CALDWELL, SR. ONLY

### (Distribution of Methamphetamine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

### **<u>COUNT NINE</u>**: DEFENDANT NATHAN CALDWELL, SR. ONLY

### (Distribution of Cocaine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT: 30 Years' Imprisonment

NMT: \$2,000,000 Fine

NLT: 6 Years' Supervised Release

Class C Felony

### <u>COUNT SIXTEEN</u>: DEFENDANT NATHAN CALDWELL, SR. ONLY

#### (Distribution of Methamphetamine)

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT: 30 Years' Imprisonment

NMT: \$2,000,000 Fine

NLT: 6 Years' Supervised Release

Class C Felony

COUNTS TWENTY, TWENTY-FOUR, and TWENTY-NINE: DEFENDANT NATHAN CALDWELL, JR.

**<u>COUNT TWENTY-THREE</u>**: **DEFENDANT NATHAN CALDWELL, SR.** 

(Distribution of Marijuana)

21 U.S.C. §§ 841(a)(1) and (b)(1)(D)

NMT: 5 Years' Imprisonment

NMT: \$250,000 Fine

NLT: 2 Years' Supervised Release

Class D Felony

ALLEGATION OF CRIMINAL FORFEITURE 21 U.S.C. § 853

#### **INDICTMENT**

#### THE GRAND JURY CHARGES THAT:

#### **COUNT ONE**

(Engaging in Firearm Sales Without a License)

Between on or about December 20, 2023, and the date of this indictment, said dates being approximate, within the Western District of Missouri, the defendants, **NATHAN CALDWELL**, **SR.**, a/k/a "PRINCE BOSSALINIE" and **NATHAN CALDWELL**, **JR.**, aiding and abetting each other, not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

### COUNT TWO

(Felon in Possession of a Firearm)

On or about December 20, 2023, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Glock, Model 21, .45 caliber handgun,

bearing Serial Number WHR314, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### COUNT THREE

(Felon in Possession of Firearms)

On or about December 28, 2023, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a Taurus, Model PT840, .40 caliber handgun, bearing Serial Number SET52773, and a Glock, Model 43X, 9mm handgun, bearing Serial Number BSAP176, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT FOUR</u> (Felon in Possession of Firearms)

On or about January 24, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a Glock, Model 20, 10mm handgun, bearing Serial Number CBPN027, and a Smith and Wesson, Model M&P-15, 5.56, pistol, equipped with an arm brace, bearing Serial Number TV31660, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT FIVE</u> (Distribution of Methamphetamine)

On or about January 24, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally

distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

#### **COUNT SIX**

### (Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about January 24, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, distribution of methamphetamine, as charged in Count Five, did knowingly and intentionally possess a firearm, to wit: a Taurus, Model C2C, 9mm handgun, bearing Serial Number ABB267203, contrary to the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

### COUNT SEVEN (Felon in Possession of a Firearm)

On or about February 20, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Taurus, Model C2C, 9mm handgun, bearing Serial Number ABB267203, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT EIGHT</u> (Distribution of Methamphetamine)

On or about February 20, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

### <u>COUNT NINE</u> (Distribution of Cocaine)

On or about February 20, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

### <u>COUNT TEN</u> (Felon in Possession of a Firearm)

On or about March 4, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Taurus, Model C2S, 9mm handgun, bearing Serial Number ACH6926113, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT ELEVEN</u> (Distribution of Methamphetamine)

On or about March 4, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

### <u>COUNT TWELVE</u> (Felon in Possession of a Firearm)

On or about March 4, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, JR.**, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a New England Firearm, Model R73, 32 H&R mag, revolver, with a

partially obliterated serial number beginning with "NG01", which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### **COUNT THIRTEEN**

(Felon in Possession of Firearms)

On or about March 15, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE", knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a Bryco, Model Jennings Nine, 9mm handgun, bearing Serial Number 1457540; a Taurus, Model 605, .357 revolver, bearing Serial Number EM74619; and a CBC, Model 715P, .22, AR-15 style pistol, bearing Serial Number ESK4343709, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

#### **COUNT FOURTEEN**

(Distribution of Methamphetamine)

On or about March 15, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

### **COUNT FIFTEEN**

(Felon in Possession of Firearms)

On or about March 21, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: an Anderson Manufacturing, Model AM-15, Multi Caliber pistol, bearing Serial Number 22132622, and a Great Lakes Firearms and

Ammunition, Model GL-15, Multi Caliber pistol, bearing Serial Number 200.7073, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT SIXTEEN</u> (Distribution of Methamphetamine)

On or about March 21, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

#### COUNT SEVENTEEN

(Possession of a Firearm in Furtherance of Drug Trafficking Crime)

On or about March 21, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, distribution of methamphetamine, as charged in Count Sixteen, did knowingly and intentionally possess a firearm, to wit: a light-colored semi-automatic handgun, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

### <u>COUNT EIGHTEEN</u> (Felon in Possession of a Firearm)

On or about April 10, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Springfield Armory, Model XD-40, .40 caliber handgun, bearing Serial Number BA288120, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

#### **COUNT NINETEEN**

### (Distribution of Methamphetamine)

On or about April 10, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

### COUNT TWENTY (Distribution of Marijuana)

On or about April 10, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, JR.**, knowingly and intentionally distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### <u>COUNT TWENTY-ONE</u> (Felon in Possession of Firearms)

On or about April 17, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a Smith and Wesson, Model M&P 45, .45 caliber handgun, bearing Serial Number HNK5695, and a Diamondback Firearms, Model DB-15, .300 blackout rifle, bearing Serial Number DB2421971, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT TWENTY-TWO</u> (Distribution of Methamphetamine)

On or about April 17, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, knowingly and intentionally distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

### COUNT TWENTY-THREE

(Distribution of Marijuana)

On or about April 17, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE," knowingly and intentionally distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

### **COUNT TWENTY-FOUR** (Distribution of Marijuana)

On or about April 17, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, JR., knowingly and intentionally distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

#### **COUNT TWENTY-FIVE**

(Felon in Possession of a Firearm)

On or about April 17, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, JR., knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a SCCY, Model CPX-1, 9mm handgun, bearing Serial Number 139745, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### **COUNT TWENTY-SIX**

(Felon in Possession of Firearms)

On or about April 29, 2024, within the Western District of Missouri, the defendant, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE," knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit: a D.P.M.S., Model A-15, multi-caliber pistol, bearing Serial Number FFH177867, an Omni Tactical, Model Omni Hybrid, multi-caliber pistol, bearing Serial Number NS335204, and a Glock frame bearing Serial Number RW518US, with an aftermarket upper receiver which was chambered in 9mm, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### <u>COUNT TWENTY-SEVEN</u> (Distribution of Methamphetamine)

On or about April 29, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, SR.**, knowingly and intentionally distributed 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

### <u>COUNT TWENTY-EIGHT</u> (Felon in Possession of a Firearm)

On or about April 29, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, JR.**, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Glock frame bearing Serial Number RW518US, with an aftermarket upper receiver which was chambered in 9mm, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

### COUNT TWENTY-NINE (Distribution of Marijuana)

On or about April 29, 2024, within the Western District of Missouri, the defendant, **NATHAN CALDWELL, JR.**, knowingly and intentionally distributed marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

#### FORFEITURE ALLEGATION

The allegations contained in Counts Five, Eight, Nine, Eleven, Fourteen, Sixteen, Nineteen, Twenty, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Seven, and Twenty-Nine

of this Indictment are hereby incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

As a result of committing the controlled substance offenses alleged in Counts Five, Eight, Nine, Eleven, Fourteen, Sixteen, Nineteen, Twenty, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Seven, and Twenty-Nine of this Indictment, NATHAN CALDWELL, SR., a/k/a "PRINCE BOSSALINIE" and NATHAN CALDWELL, JR. shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, all property, real and personal, constituting or derived from any proceeds said defendants obtained directly and indirectly as a result of the violations of Title 21, United States Code, Section 841, as charged in Counts Five, Eight, Nine, Eleven, Fourteen, Sixteen, Nineteen, Twenty, Twenty-Two, Twenty-Three, and Twenty-Four of this Indictment, and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the said violation, including but not limited to: A money judgment representing all proceeds the defendants obtained directly and indirectly as a result of their participation in the drug offenses alleged in Counts Five, Eight, Nine, Eleven, Fourteen, Sixteen, Nineteen, Twenty, Twenty-Two, Twenty-Three, Twenty-Four, Twenty-Seven, and Twenty-Nine of this Indictment.

#### **Substitute Assets**

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with, a third party;
- 3. has been placed beyond the jurisdiction of the court;
- 4. has been substantially diminished in value; or

5. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

All in accordance with Title 21, United States Code, Section 853; and Rule 32.2(a) Federal Rules of Criminal Procedure.

### ENHANCED PUNISHMENT NOTICE

The Grand Jury makes the following additional findings:

On or about August 22, 2008, the defendant, **NATHAN CALDWELL, SR.**, a/k/a "PRINCE BOSSALINIE" was convicted of a felony drug offense, Possession of Cocaine, in the District Court of Wyandotte County, Kansas, Case Number 06CR1594.

A TRUE BILL.

05/07/2024	/s/Kimberley Deardorff
DATE	FOREPERSON OF THE GRAND JURY

/s/Jessica L. Jennings

Jessica L. Jennings Special Assistant United States Attorney Violent Crime & Drug Trafficking Unit Western District of Missouri